

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the
Commonwealth and ERS.**

ORDER GRANTING TWO HUNDRED EIGHTY-FIFTH OMNIBUS OBJECTION (NON-
SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO TO MISCELLANEOUS DEFICIENT CLAIMS

Upon the *Two Hundred Eighty-Fifth Omnibus Objection (Non-Substantive) of the
Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the
Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 15699] (the “Two
Hundred Eighty-Fifth Omnibus Objection”),² filed by the Commonwealth of Puerto Rico

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Two Hundred Eighty-Fifth Omnibus Objection.

(“Commonwealth”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), dated January 22, 2021, for entry of an order disallowing in their entirety certain claims filed against the Commonwealth or ERS, as more fully set forth in the Two Hundred Eighty-Fifth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Two Hundred Eighty-Fifth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Two Hundred Eighty-Fifth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in Exhibit A to the Two Hundred Eighty-Fifth Omnibus Objection (collectively, the “Deficient Claims”) having been found to be deficient; and the Court having determined that the relief sought in the Two Hundred Eighty-Fifth Omnibus Objection is in the best interests of the Commonwealth, ERS, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Two Hundred Eighty-Fifth Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Two Hundred Eighty-Fifth Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Two Hundred Eighty-Fifth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Deficient Claims are hereby disallowed in their entirety; and it is further

ORDERED that Prime Clerk, LLC, is authorized and directed to designate the Deficient Claims as expunged in the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 15699 in Case No. 17-3283;
and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters
arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Two Hundred Eighty-Fifth Omnibus Objection

Two Hundred and Eighty-Fifth Omnibus Objection
Exhibit A - Deficient Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	BONILLA DE JESUS, MARIA V CALLE CLAVEL J13 JARDINES 2 CAYEY, PR00736	6/6/2020	17 BK 03283-LTS	Commonwealth of Puerto Rico	174055	\$ 75,000.00
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					
2	GUZMAN, JACINTO BURGOS BUZON 130 MAUNABO, PR 00707	6/25/2020	17 BK 03283-LTS	Commonwealth of Puerto Rico	174122	Undetermined*
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					
3	LEBRON RAMOS, ISMAEL CARR. 181 R757 K-1 #8 BO. LOS POLLOS SEC. 4 CALLE PATILLAS, PR00723	6/16/2020	17 BK 03283-LTS	Commonwealth of Puerto Rico	174118	Undetermined*
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					
4	MERCADO SOTO, ANGEL MANUEL URB LLANOS DEL SUR 457 CALLE LAS ROSAS COTO LAUREL, PR 00780-2833	7/8/2020	17 BK 03283-LTS	Commonwealth of Puerto Rico	174250	Undetermined*
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					
5	MONTES ORTIZ, VICTOR BO. PALO SECO LOS CHINOS CARR. 3 R759 K2H3 MAUNABO, PR 00707	6/23/2020	17 BK 03283-LTS	Commonwealth of Puerto Rico	174144	Undetermined*
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					
6	PENA ALVARADO, NYDIA P.O. BOX 298 OROCOVIS, PR 00720	6/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	100902	Undetermined*
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					

Two Hundred and Eighty-Fifth Omnibus Objection
Exhibit A - Deficient Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
7	RAMIREZ RODRIGUEZ, JORGE LUIS 685 BLUEGRASS DR SPRING CREEK, NV 89815	6/18/2020	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	174104	\$ 200,000.00
	Reason: Proof of claim purports to assert liabilities associated with the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Employees Retirement System of the Government of the Commonwealth of Puerto Rico or any of the other Title III debtors					
8	RIVERA SILVA, JULIO BARRIO PALO SECO BUZON II 3 MAUNABO, PR 00707	6/25/2020	17 BK 03283-LTS	Commonwealth of Puerto Rico	174132	Undetermined*
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					
9	RODRIGUEZ CALDERON, ERIC PO BOX 1219 CANOVANAS, PR 00729	7/3/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	87493	Undetermined*
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					
10	RODRIGUEZ SANTOS, CARMEN 260 CALLE DEL VALLE S SAN JUAN, PR 00912	6/16/2020	17 BK 03283-LTS	Commonwealth of Puerto Rico	174117	Undetermined*
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					
					TOTAL	\$ 275,000.00*